

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-cv-6563 (LJL)

**DECLARATION OF M. ANNIE HOUGHTON-LARSEN IN SUPPORT OF
PLAINTIFFS' LETTER REQUESTING A STATUS CONFERENCE**

I, M. Annie Houghton-Larsen, an attorney admitted to practice in this court, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am counsel to Plaintiffs Ruby Freeman and Wandrea' Moss ("Plaintiffs") in the above-captioned action.

2. I submit this declaration in support of Plaintiffs' Letter requesting a status conference.

3. On November 3, 2024, Mr. Rudolph Giuliani served Plaintiffs with his initial disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1). Plaintiffs have modified the formatting of Mr. Giuliani's initial disclosures to add in spaces, which were deleted in the document served. The substance of these disclosures has not been altered in any way. A true and correct copy of Mr. Giuliani's initial disclosures, both the original and re-formatted as described, are attached as Exhibit A.

4. On December 2, 2024, Mr. Giuliani returned responses to Plaintiffs' First Set of Interrogatories and Plaintiff's First Set of Contention Interrogatories, which were executed on

December 1, 2024. A true and correct copy of Mr. Giuliani's response to Plaintiffs' First Set of Interrogatories and First Set of Contention Interrogatories is attached as Exhibit B.

5. On December 2, 2024, Plaintiffs' counsel emailed Mr. Giuliani's counsel asking him to confirm that Mr. Giuliani's initial disclosure remained accurate in light of additional individuals with information about Mr. Giuliani's defense, identified in Mr. Giuliani's Response to Plaintiffs' First Set of Interrogatories. A true and correct copy of that email correspondence is attached as Exhibit C.

6. Beginning on December 2, 2024 and continuing through December 11, 2024, Plaintiffs' counsel corresponded with Mr. Andrew Giuliani's counsel via email, regarding multiple topics, including the witnesses Mr. Andrew Giuliani intended to call at trial. A true and correct copy of the email correspondence is attached as Exhibit D.

7. On December 8, 2024, Mr. Giuliani served Plaintiffs with amended initial disclosures, which added five additional witnesses. A true and correct copy of Mr. Giuliani's amended initial disclosures are attached as Exhibit E.

8. Beginning on December 9, 2024 and continuing through December 12, 2024, Plaintiffs' counsel corresponded with Mr. Giuliani's counsel via email, regarding the additional witnesses listed in Mr. Giuliani's amended initial disclosures. A true and correct copy of that correspondence is attached as Exhibit F.

9. As of the time of filing on December 13, 2024, Plaintiffs have not received a response from Mr. Rudolph Giuliani's counsel regarding the witnesses identified in the amended initial disclosures. Instead, after Plaintiffs' counsel emailed Defendant's counsel to state that they would need to seek the Court's intervention if they did not hear back by 10:00 a.m. on December 13, Defendant's counsel responded in the evening of December 12 asking to speak at noon the

following day and stating that “There are other witnesses that need to be deposed.” Mr. Giuliani’s attorney did not provide any additional information or address any of the outstanding issues.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 13, 2024.

s/ M. Annie Houghton-Larsen
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